



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 19 2015

REPLY TO THE ATTENTION OF:

E-19J

Cindy Bladey
Rules, Announcements, and Directives Branch
Office of Administration
Mail Stop 3WFN-06-44M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Plant-Specific Supplement 52 to the Generic Environmental Impact Statement for the License Renewal of Davis-Besse Nuclear Power Station, Unit 1, Oak Harbor, Ottawa County, Ohio. NUREG-1437. CEQ #20150126.

Dear Ms. Bladey:

The U.S. Environmental Protection Agency has reviewed the Final Supplemental Environmental Impact Statement (SEIS) for the above-mentioned project prepared by the Nuclear Regulatory Commission (NRC). Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Davis-Besse Nuclear Power Station, Unit 1 (Davis-Besse) is located in Oak Harbor, Ottawa County, Ohio approximately 25 miles east of Toledo, Ohio. The 954-acre site is on the shore of Lake Erie, adjacent to the Toussaint River. Approximately 700 acres of the site are leased to the U.S. Fish and Wildlife Service under the Ottawa National Wildlife Refuge. Davis-Besse is a single-unit pressurized water reactor that uses closed-cycle cooling via one cooling tower. The facility is licensed for an electrical output of 913 megawatt-electric (MWe). Spent fuel is stored in a pool inside the plant until it is cooled and transferred to an onsite independent spent fuel storage installation, where it will remain until a permanent repository is developed.

Davis-Besse is owned and operated by FirstEnergy Nuclear Operating Company (the applicant). The applicant applied to NRC for an extension to its operating license, extending operation for an additional 20-year period. Based on information provided by the applicant, NRC's preferred alternative is to grant the 20-year extension.

The NRC developed a Generic Environmental Impact Statement (EIS) to streamline the license renewal process based on the premise that environmental impacts of most nuclear power plant license renewals are similar. NRC develops facility-specific supplemental EIS documents as the facilities apply for license renewal.

EPA provided comments on the Draft EIS on April 10, 2014. Our concerns focused potential impacts due to refurbishment and continued operation of the facility, particularly to terrestrial and aquatic resources. A brief review and any recommended further action is described in the following paragraphs.

Appendix A of the Final EIS identified EPA as commenter number 25. Each individual comment has been numerically coded and hyphenated to the commenter number, i.e., comment number 25-5-AQ. EPA will continue this coding system for easier reference back to the EIS.

The following comments have been sufficiently addressed and EPA has no further comments or concerns:

Comment 25-5-AQ:

EPA appreciates NRC's revisions regarding the Maumee River Area of Concern.

Comment 25-11-LR:

EPA appreciates NRC's commitment to ensuring that color maps are provided via ADAMS for public review.

The following comments have been insufficiently addressed in the Final EIS.

Comment 25-2-TR, 25-3-OS, 25-6-AQ, and 25-4-AM:

The above-listed comments pertain to incorporation of mitigation measures considered, by NRC, to be outside of the scope of the license renewal application. EPA appreciates that some of our recommendations for reducing impacts from construction activities were ultimately included in the Final SEIS, Section 3.2.1. However, we continue to recommend the applicant incorporate the following as measures to further reduce environmental impacts as a result of the proposed project:

- Diesel emission reduction measures,
- Leadership in Energy and Environmental Design (LEED) standards,
- Use of sustainable infrastructure, such as permeable pavement, and
- Stay within already-disturbed areas, avoiding, in particular, wetlands.

We also acknowledge that some refurbishment activities took place before the publication of the Draft SEIS and close of comment period, preventing the applicant from incorporating the above measures into design and construction.

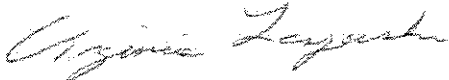
We note that NRC is unable to require mitigation measures unrelated to nuclear security and safety in license. However, as noted above, we continue to make recommendations related to reducing the overall environmental impact of the project and support inclusion of these measures as the applicant sees fit. Based on a conversation between Elaine Keegan of NRC and Elizabeth Poole of my staff, future comment letters from EPA – Region 5 will include language to this effect.

Comment 25-1-LR:

EPA continues to recommend impacts to resources that are defined in a range have a clear metric to define how that impact could move from lesser significance to higher significance. Additionally, the Final EIS should outline mitigation measures available, although maybe not required under the purview of NRC's license renewal authority, to reclassify impacts from a higher impact to a lesser one. All of the evaluations that have been provided in the Final EIS, while they may be subjectively correct, still provide no real specific objective metric for other evaluators, or the public, to be able to make informed comparisons and evaluations, that are now required in plain writing mandates.

Thank you in advance for your consideration of our recommendations to further reduce environmental impacts as a result of this project. Please send us a copy of the license and ROD when it becomes available. If you have any questions, please feel free to contact me or Mike Lukowich, P.E., of my staff at 312-353-4645 or Lukowich.Michael@epa.gov.

Sincerely,



Virginia Zapata
Acting For

Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Cc: Elaine Keegan, U.S. Nuclear Regulatory Commission

